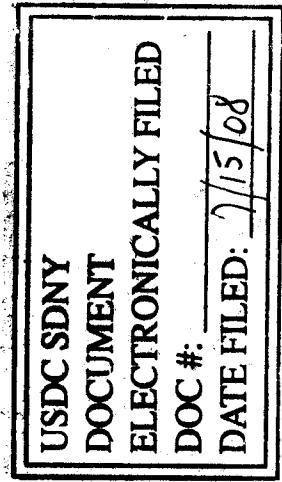


JUDGE GARDEPHE

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
 UNITED STATES OF AMERICA :
 :
 -v- : SEALED
 : INDICTMENT
 JUAN ALBERTO PEREIRA CELEMIN, :
 MIGUEL ANTONIO PEREIRA CELEMIN, :
 HAIDER FARITH GONZALEZ LARRADA, :
 a/k/a "El Indio," :
 ALCIBIADES ENRIQUE CERVANTES CUJIA, :
 WILLIAM ARDILA, :
 a/k/a "Titi," :
 FREDDY RAFAEL OROZCO GARCIA, :
 a/k/a "Black," :
 ADRIAN LENY HERRERA DELGANS, :
 a/k/a "El Chino," and :
 JULIAN DAVID HURTADO OCHOA, :
 a/k/a "Juan K," :
 :
 Defendants. :
 :
 -----X

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2005, up to and including February 2008, in the Southern District of New York and elsewhere, JUAN ALBERTO PEREIRA CELEMIN, MIGUEL ANTONIO PEREIRA CELEMIN, HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," ALCIBIADES ENRIQUE CERVANTES CUJIA, WILLIAM ARDILA, a/k/a "Titi," FREDDY RAFAEL OROZCO GARCIA, a/k/a "Black," and ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did

combine, conspire, confederate, and agree together and with each other, to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JUAN ALBERTO PEREIRA CELEMIN, MIGUEL ANTONIO PEREIRA CELEMIN, HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," ALCIBIADES ENRIQUE CERVANTES CUJIA, WILLIAM ARDILA, a/k/a "Titi," FREDDY RAFAEL OROZCO GARCIA, a/k/a "Black," and ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," the defendants, and others known and unknown, would and did import into the United States, from a place outside thereof, to wit, Colombia, mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 952, 960(a)(1) and 960(b)(1)(B)(ii).

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about August 6, 2007, in Colombia, HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," the defendant, and a co-conspirator not named herein ("CC-1") discussed, by telephone, the discovery and seizure by Colombian authorities of a submarine equipped to transport ten tons of cocaine.

b. On or about August 7, 2007, in Colombia, HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," and MIGUEL ANTONIO PEREIRA CELEMIN, the defendants, discussed by telephone news reports of the seizure of the submarine.

c. On or about August 15, 2007, in Colombia, HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio" and ALCIBIADES ENRIQUE CERVANTES CUJIA, the defendants, discussed by telephone the payment of protection money to a paramilitary organization to safeguard the transport of a load of 220 kilograms of cocaine.

d. On or about August 16, 2007, HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," the defendant, telephoned JUAN ALBERTO PEREIRA CELEMIN, the defendant, in the Dominican Republic, to discuss a shipment of 100 kilograms of cocaine to GONZALEZ LARRADA in Maicao, Colombia.

e. In or about August 2007, in Colombia, FREDDY RAFAEL OROZCO GARCIA, a/k/a "Black," the defendant, delivered 27 kilograms of cocaine to MIGUEL ANTONIO PEREIRA CELEMIN, the defendant.

f. In or about August 2007, in Colombia, ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," the defendant, arranged the delivery of 27 kilograms of cocaine to HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," the defendant.

g. On or about August 30, 2007, in Colombia,

HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," ALCIBIADES ENRIQUE CERVANTES CUJIA, and MIGUEL ANTONIO PEREIRA CELEMIN, the defendants, discussed by telephone the seizure by Colombian police of 220 kilograms of cocaine in Maicao, Colombia, located inside a secret compartment in a bus.

h. On or about August 29, 2007, in Maicao, Colombia, WILLIAM ARDILA, a/k/a "Titi," and HAIDER FARITH GONZALEZ LARRADA, a/k/a "El Indio," the defendants, supervised the delivery of a load of 220 kilograms of cocaine in Maicao, Colombia, located inside a secret compartment in a bus.

i. On or about May 22, 2007 and on or about June 18, 2007, MIGUEL ANTONIO PEREIRA CELEMIN, the defendant, spoke with a co-conspirator not named herein ("CC-2"), located in the Dominican Republic, regarding the delivery of narcotics to New York City.

j. On or about August 8, 2007, in the Bronx, New York, a co-conspirator not named herein ("CC-2") delivered \$52,000 in narcotics proceeds to a law enforcement agent acting in an undercover capacity.

(Title 21, United States Code, Section 963.)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about 2005, up to and including February 2008, in the Southern District of New York and elsewhere, JUAN ALBERTO PEREIRA CELEMIN, MIGUEL ANTONIO PEREIRA CELEMIN, ALCIBIADES ENRIQUE CERVANTES CUJIA, WILLIAM ARDILA, a/k/a "Titi," FREDDY RAFAEL OROZCO GARCIA, a/k/a "Black," ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," and JULIAN DAVID HURTADO OCHOA, a/k/a "Juan K," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other, to violate Title 18, United States Code, Section 1956.

5. It was a part and an object of the conspiracy that JUAN ALBERTO PEREIRA CELEMIN, MIGUEL ANTONIO PEREIRA CELEMIN, ALCIBIADES ENRIQUE CERVANTES CUJIA, WILLIAM ARDILA, a/k/a "Titi," FREDDY RAFAEL OROZCO GARCIA, a/k/a "Black," ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," and JULIAN DAVID HURTADO OCHOA, a/k/a "Juan K," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfers of hundreds of thousands of dollars in cash, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct

such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(I).

OVERT ACTS

6. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about July 31, 2007, MIGUEL ANTONIO PEREIRA CELEMIN and ALCIBIADES ENRIQUE CERVANTES CUJIA, the defendants, discussed the pickup of narcotics proceeds located in New York City.

b. On or about August 1, 2007, and on or about August 6, 2007, in Colombia, JULIAN DAVID HURTADO OCHOA, a/k/a "Juan K," and MIGUEL ANTONIO PEREIRA CELEMIN, the defendants, discussed the details of a pickup of tens of thousands of dollars in cash narcotics proceeds in New York City.

c. In or about the first week of August 2007, in the Dominican Republic, JUAN ALBERTO PEREIRA CELEMIN, the defendant, spoke to an unidentified male ("UM-1") regarding the delivery of narcotics proceeds in New York City.

d. On or about August 8, 2007, in the Bronx, New York, a co-conspirator not named herein ("CC-2") delivered tens of thousands of dollars in cash narcotics proceeds to a law enforcement agent acting in an undercover capacity.

e. On or about August 24, 2007, FREDDY RAFAEL OROZCO GARCIA, a/k/a "Black," spoke with an unidentified male ("UM-2") located in Panama regarding the delivery of narcotics proceeds.

f. On or about January 29, 2007, in Colombia, ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," and MIGUEL ANTONIO PEREIRA CELEMIN, the defendants, discussed wire transfers of narcotics proceeds for the benefit of MIGUEL ANTONIO PEREIRA CELEMIN in the name of WILLIAM ARDILA, a/k/a "Titi," the defendant.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION AS TO COUNT ONE

7. As a result of committing the controlled substance offenses alleged in Count One of this Information, JUAN ALBERTO PEREIRA CELEMIN, MIGUEL ANTONIO PEREIRA CELEMIN, HAIDER FARITH GONZALEZ LARRADA ALCIBIADES ENRIQUE CERVANTES CUJIA, a/k/a "El Indio," WILLIAM ARDILA, a/k/a "Titi," FREDDY RAFAEL OROZCO

GARCIA, a/k/a "Black," and ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment, including a sum of money representing the amount of proceeds obtained as a result of the offense alleged in Count One of this Indictment.

Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third person;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said

defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

FORFEITURE ALLEGATION AS TO COUNT TWO

9. As a result of conspiring to commit the money laundering offense alleged in Counts Two of this Indictment, in violation of Title 18, United States Code, Section 1956(h), JUAN ALBERTO PEREIRA CELEMIN, MIGUEL ANTONIO PEREIRA CELEMIN, ALCIBIADES ENRIQUE CERVANTES CUJIA, WILLIAM ARDILA, a/k/a "Titi," FREDDY RAFAEL OROZCO GARCIA, a/k/a "Black," ADRIAN LENY HERRERA DELGANS, a/k/a "El Chino," and JULIAN DAVID HURTADO OCHOA, a/k/a "Juan K," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) all property, real and personal, involved in the money laundering offense.

Substitute Asset Provision

10. If any of the forfeitable property described in paragraph 14, above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;

or

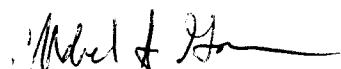
e. has been commingled with other property which
cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18,
United States Code, Section 982(b), to seek forfeiture of any
other property of said defendants up to the value of the above
forfeitable property.

(Title 18, United States Code, Section 981(a)(1)(c).)


Keith Miller

FOREPERSON


Michael J. Garcia

MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JUAN ALBERTO PEREIRA CELEMIN,
MIGUEL ANTONIO PEREIRA CELEMIN,
HAIDER FARITH GONZALEZ LARRADA,
a/k/a "El Indio,"
ALCIBIADES ENRIQUE CERVANTES CUJIA,
WILLIAM ARDILA, a/k/a "Titi,"
FREDDY RAFAEL OROZCO GARCIA,
a/k/a "Black,"
ADRIAN LENY HERRERA DELGANS,
a/k/a "El Chino," and
JULIAN DAVID HURTADO OCHOA,
a/k/a "Juan K."
Defendants.

INDICTMENT

S1 08 Cr. 165

(Title 21, United States Code,
Section 963, and Title 18, United States
Code 1956(h).)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Keith Miller
Foreperson.
